REMARKS

Applicants hereby traverse the current rejections, and request reconsideration and withdrawal of the rejections in light of the remarks contained herein. Claims 1-37 are pending in this application.

I.   CLAIM REJECTIONS UNDER 35 USC § 102(e)

Claims 1-5, 7, and 8 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Singhal* et al. (US Patent No. 6,925,481, hereinafter *Singhal*).

It is well settled that to anticipate a claim, the reference must teach every element of the claim, *see* M.P.E.P. § 2131. Moreover, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he elements must be arranged as required by the claim," *see* M.P.E.P. § 2131, citing *In re Bond*, 15 US.P.Q.2d 1566 (Fed. Cir. 1990). Furthermore, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim," *see* M.P.E.P. § 2131, *citing Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913 (Fed. Cir. 1989). Applicant respectfully asserts that the rejections do not satisfy these requirements.

A.   *Claims 1-5 and 7-8*

Claim 1 requires two or more appliances comprising "an application information base (AIB) for storing interface information for each of said two or more appliances connected to said appliance network." *Singhal* does not teach at least these limitations.

The Examiner reads *Singhal*'s DMS 160 onto an AIB and *Singhal*'s WID 130 onto an appliance at page 3 of the Office Action. Applicant respectfully notes that claim 1 teaches that each appliance comprises an AIB, whereas none of *Singhal*'s WIDs 130 teach or suggest comprising DMS 160. To the contrary, *Singhal* teaches DMS 160 being separate from WID 130. Further, Applicant notes that *Singhal*'s DMS 160 does not store appliance compatibility information, (*Singhal*, column 7, lines 49-54), rather it maintains a table identifying available data manipulation services. Thus, *Singhal* does not teach nor suggest all limitations of claim

1. Therefore, Applicant respectfully asserts that for at least the above reasons, claim 1 is patentable over *Singhal* and requests the 35 U.S.C. § 102(e) rejection be withdrawn.

Claims 2-5 and 7-8 each depend from independent claim 1 and inherit all the limitations of claim 1. Thus, claims 2-5 and 7-8 each set forth features and limitations not found in the cited reference, as discussed above. Therefore, Applicant respectfully asserts that claims 2-5 and 7-8 are patentable over *Singhal* and requests the 35 U.S.C. § 102(e) rejection be withdrawn.

II.   CLAIM REJECTIONS UNDER 35 USC § 103(a)

Claims 6, 9-19, 21-25, and 27-37 are rejected under 35 USC § 103(a) as being unpatentable over *Singhal* in view of *Margulis et al.* (US Patent No. 6,157,396, hereinafter *Margulis*).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Applicant asserts that the rejections do not satisfy all criteria.

It should be noted that the Examiner failed to explicitly state a motivation to modify or combine the teachings of *Singhal* and *Margulis* for purposes of the rejections of claims 16, 19, 22-23, 27, 30-31, and 37.

A.   Claim 6

Claim 6 depends from independent claim 1 and inherits all the limitations of claim 1. Thus, claim 6 sets forth features and limitations not found in *Singhal*, as discussed above. *Margulis* is not relied upon as teaching these limitations nor does *Margulis* teach or suggest such limitation. Therefore, Applicant respectfully asserts that claim 6 is patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

B.   Claims 9-16

Claim 9 requires "[a] method for dynamically reformatting multimedia information in a network of appliances comprising the steps of: ... receiving said multimedia information from one of said appliances at a local appliance." *Singhal* in view of *Margulis* does not teach or suggest at least these limitations.

The Examiner reads WID 130 onto an appliance, alleging that *Singhal* teaches receiving said multimedia information from one of said appliances at a local appliance at page 7 of the Office Action. However, Applicant notes that claim 9 teaches that a local appliance receives multimedia information from one of the other appliances. In contrast, WIDs 130 receive multimedia information from World-Wide Web 110 through Protocol Proxy 120, instead of from other WIDs 130. *Margulis* is not relied upon as teaching these limitations nor does it teach or suggest such limitations. Thus, *Singhal* in view of *Margulis* does not teach or suggest all the limitations of claim 9. Therefore, Applicant respectfully asserts that for at least the above reasons, claim 9 is patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

Claims 10-16 each depend either directly or indirectly from claim 9 and inherit all the limitations thereof. Thus, Claims 10-16 each set forth features and limitations not found in the cited reference, as discussed above. Therefore, Applicant respectfully asserts that Claims 10-16 are patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

C.   Claims 17-19

Claim 17 requires "a memory for storing appliance compatibility information received from each of said appliances on said appliance network;" *Singhal* in view of *Margulis* does not teach at least these limitations.

The Examiner, at page 12, reads *Singhal*'s DMS 160 onto a memory for storing appliance compatibility information. However, Applicant notes that *Singhal*'s DMS 160 does not store appliance compatibility information, (*Singhal*, column 4, lines 2-3; column 7, lines 4-6 and 49-54), rather it maintains a table identifying available data manipulation

services. *Margulis* is not relied upon as disclosing these limitations nor does it teach or suggest such limitations. Thus, *Singhal* in view of *Margulis* does not teach or suggest all limitations of claim 17. Therefore, Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claim 17 be withdrawn.

Claims 18-19 each depend either directly or indirectly from claim 17 and inherit all the limitations thereof. Thus, Claims 18-19 each set forth features and limitations not found in the cited reference, as discussed above. Therefore, Applicant respectfully asserts that Claims 18-19 are patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

D.   Claims 21-25, 27, and 28

Claim 21 requires "an appliance manager for obtaining interface information for each appliance connected to said network of appliances." *Singhal* in view of *Margulis* does not read at least these limitations.

The Examiner, at page 14, reads *Singhal*'s DMS 160 onto an appliance manager for obtaining interface information. However, Applicant notes that DMS 160 does not obtain interface information, rather DMS 160 maintains a repository of available services (*Singhal*, column 7, lines 49-54). *Margulis* is not relied upon as disclosing these limitations nor does it teach or suggest such limitations. Thus, *Singhal* in view of *Margulis* does not teach or suggest all limitations of claim 21. Therefore, Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claim 21 be withdrawn.

Claims 22-25, 27, and 28 each depend either directly or indirectly from claim 21 and inherit all the limitations thereof. Thus, Claims 22-25, 27, and 28 each set forth features and limitations not found in the cited reference, as discussed above. Therefore, Applicant respectfully asserts that Claims 22-25, 27, and 28 are patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

Claims 29-37

Claim 29 requires "decoding a format of said received media information according to stored user interface information." *Singhal* in view of *Margulis* does not read at least these limitations.

The Examiner, at page 18, reads *Singhal*'s DMS 160 as decoding media information according to stored user interface information (subparagraph b). However, Applicant notes that DMS 160 does not decode media information nor does it store user interface information. Rather, DMS 160 may directly or indirectly manipulate content and maintains a table identifying available data manipulation services (*Singhal*, column 7, lines 49-54). *Margulis* is not relied upon as disclosing these limitations nor does it teach or suggest such limitations. Thus, *Singhal* in view of *Margulis* does not teach or suggest all limitations of claim 29. Therefore, Applicant respectfully requests that the 35 U.S.C. § 103(a) rejection of claim 29 be withdrawn.

Claims 30-37 each depend either directly or indirectly from claim 29 and inherit all the limitations thereof. Thus, Claims 30-37 each set forth features and limitations not found in the cited reference, as discussed above. Therefore, Applicant respectfully asserts that Claims 30-37 are patentable over *Singhal* in view of *Margulis* and requests the 35 U.S.C. § 103(a) rejection be withdrawn.

III. CLAIM REJECTIONS UNDER 35 USC § 103(a)

Claims 20 and 26 are rejected under 35 USC § 103(a) as being unpatentable over *Singhal* and *Margulis* and further in view of *Carrein* (US Patent No. 6,252,744, hereinafter *Carrein*).

Claims 20 and 26 depend from independent claims 17 and 21 respectively, inheriting all the limitations of their respective base claim. As noted above, neither *Singhal* nor *Margulis* teach all of the limitations of claims 17 and/or 21, either alone or in combination. Thus, claims 20 and 26 set forth features and limitations not found in *Singhal* in view of *Margulis*, as discussed above. *Carrein* is not relied upon as teaching these limitations nor does it teach or suggest such limitations. Therefore, Applicant respectfully asserts that claims

20 and 26 are patentable over *Singhal* in view of *Margulis* in further view of *Carrein* and the 35 U.S.C. § 103(a) rejection be withdrawn.

CONCLUSION

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10004830-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No. EV568258216US, in an envelope addressed to: MS Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Date of Deposit: December 14, 2005

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